

September 22, 2015



Charles L. Ryan
Director, Arizona Department of Corrections
Central Office
1601 West Jefferson
Phoenix, AZ 85007

Corporate Headquarters
One Park Place, Suite 700
621 Northwest 53rd Street
Boca Raton, Florida 33487

TEL: 561 893 0101
866 301 4436
www.geogroup.com

RE: Assignment of ASP-Kingman Prison Contract

Dear Director Ryan:

The GEO Group, Inc. (GEO) is pleased to submit our formal response regarding the assignment of the Management & Training Corporation (MTC)/Arizona Department of Corrections (ADC) Contract No. AD9-010-A3 and the MTC/Mohave Prison, LLC Management ASP-Kingman contract.

GEO has reviewed the material provided and toured the Kingman complex. We understand and acknowledge the requirements of the contract and the work to be performed. GEO is prepared to commit to undertake the services outlined in the Framework and Schedule for Vendor Responses and the contracts attached to that document.

GEO's key points of contact for MTC and ADC regarding the assigned contract will be:

- John M. Hurley, President, GEO Corrections and Detention
Telephone: (561) 893-0101 Ext. 7380 Email: jhurley@geogroup.com
- James Black, Vice President, Western Region
Telephone: (310) 348-3001 Email: jblack@geogroup.com

GEO is the world's largest private corrections service provider and is listed on the New York Stock Exchange. Worldwide, GEO operates, manages, and/or has under development 104 correctional, detention, and community re-entry service facilities with approximately 84,000 beds and approximately 20,000 employees. For the past decade, GEO has successfully managed and operated three (3) Arizona State Prison facilities: the 1,280 bed Central Arizona Correctional Facility, the 500 bed ASP – Phoenix West, and the 750 bed ASP – Florence West facilities.

We would be deeply honored to be selected for the management and operation of the ASP-Kingman complex.

Thank you in advance for your consideration. If you should need any further information, please do not hesitate to contact me at (561) 893-0101 extension 733 or via email at dventurella@geogroup.com.

Sincerely,



David J. Venturella
Senior Vice President, Business Development
The GEO Group, Inc.

cc: Scott Marquardt, President, Chairman & CEO
Management & Training Corporation

1. Qualifications/Experience

1. Provide your organization's total length (years & months) of experience operating correctional institutions under contract.

GEO Response: Twenty-seven (27) years

2. Provide the number of correctional institutions your organization currently operates and identify locations.

GEO Response: GEO operates thirty-two (32) correctional institutions (not including 21 detention facilities that house detainees on behalf of the ICE and USMS). Please see Attachments A and B in Section 5, *Attachments/Appendix*, of our response, which illustrates The GEO Group's entire US operational footprint.

Correctional Facility	Capacity	Location
Reeves County Detention Complex (Reeves 1, 2 and 3 Units)	3,763	Pecos, TX
Big Spring Correctional Center	3,509	Big Spring, TX
New Castle Correctional Facility	3,196	New Castle, IN
Lawton Correctional Facility	2,526	Lawton, Oklahoma
D. Ray James Correctional Facility	2,507	Folkston, GA
Blackwater River Correctional Facility	2,000	Milton, FL
South Bay Correctional Facility	1,948	South Bay, FL
Great Plains Correctional Facility	1,940	Hinton, Oklahoma
Graceville Correctional Facility	1,884	Graceville, FL
Moshannon Valley Correctional Facility	1,820	Phillipsburg, PA
Allen Correctional Center	1,576	Kinder, LA
Lawrenceville Correctional Centre	1,536	Lawrenceville, VA
Riverbend Correctional Facility	1,500	Milledgeville, GA
Rivers Correctional Facility	1,450	Winton, NC
Central Arizona Correctional Facility	1,280	Florence, AZ
Lea County Correctional Facility	1,200	Hobbs, NM
Heritage Trails Correctional Facility	1,066	Plainfield, IN
Bay Correctional Facility	985	Panama City, FL
Moore Haven Correctional Facility	985	Moore Haven, FL
ASP-Florence West	750	Florence, AZ

Central Valley MCC Facility	700	McFarland, CA
Desert View MCC Facility	700	Adelanto, CA
Golden State MCC Facility	700	McFarland, CA
North Lake Correctional Facility	675	Baldwin, MI
Guadalupe County Correctional Facility	600	Santa Rosa, NM
ASP-Phoenix West	500	Phoenix, AZ
McFarland Female Comm. Reentry Facility	300	McFarland, CA
Kutama Sinthumule Correctional Centre	3,024	Louis Trichardt, SA
Parklea Correctional Centre	823	Parklea, New South Wales, AU
Junee Correctional Centre	790	Junee, New South Wales, AU
Fulham Correctional Centre	717	West Sale, Victoria, AU
Fulham Nalu Challenge Community Unit	68	West Sale, Victoria, AU

3. Provide the number of correctional compound/complex institutions you have managed in the last five years and the associated institutional contract capacity and inmate custody level. Please denote if you are currently still operating the correctional compound/complex institution(s).

GEO Response: GEO is presently operating the following nine (9) correctional complex/compounds.

Complex	Contract Capacity	Custody Level
Reeves County, Texas	3,763	Low to Medium
Big Spring, Texas	3,509	Low to Medium
New Castle, Indiana	3,196	Minimum to Maximum
Kutama Complex, South Africa	3,024	Maximum
Lawton, Oklahoma	2,526	Minimum to Maximum
D. Ray James, Georgia	2,507	Low to Medium
Blackwater, Florida	2,000	Minimum to Close
South Bay, Florida	1,948	Minimum to Close
Great Plains, Oklahoma	1,940	Low to Medium



4. How many facilities do you operate that house 3,000+ inmates and what are the custody level(s)?

GEO Response: Four (4) correctional facilities ranging from minimum to maximum security.

Reeves County, Texas	3,763	Low to Medium
Big Spring, Texas	3,509	Low to Medium
New Castle, Indiana	3,196	Minimum to Maximum
Kutama Complex, South Africa	3,024	Maximum

5. How many facilities do you operate that house 2,000 – 2,999 inmates and what are the custody level(s)?

GEO Response: Three (3) correctional facilities ranging from minimum to close security.

Lawton, Oklahoma	2,526	Minimum to Maximum
D. Ray James, Georgia	2,507	Low to Medium
Blackwater, Florida	2,000	Minimum to Close

6. How many facilities do you operate that house 1,000 – 1,999 inmates and what are the custody level(s)?

GEO Response: Eleven (11) correctional facilities ranging from minimum to close security

South Bay, Florida	1,948	Minimum to Close
Great Plains, Oklahoma	1,940	Low to Medium
Graceville, Florida	1,884	Minimum to Close
Moshannon Valley, Pennsylvania	1,820	Low to Medium
Allen, Louisiana	1,576	Medium to High
Lawrenceville, Virginia	1,536	Medium
Riverbend, Georgia	1,500	Medium
Rivers, North Carolina	1,450	Low to Medium
Central Arizona, Arizona	1,280	Medium
Lea County, New Mexico	1,200	Medium to High
Heritage Trails, Indiana	1,066	Minimum

7. Provide the number of correctional institutions you currently manage that require American Correctional Association (ACA) accreditation. Have any of these correctional institutions failed to obtain or lost ACA accreditation? If yes, please explain.

GEO Response: GEO has 42 facilities that require ACA accreditation by contract and are accredited. Additionally, GEO has 7 other facilities that do not contractually require ACA accreditation but for which GEO has achieved accreditation at its own choosing.

We presently have no facilities which have failed ACA accreditation or have had their ACA accreditation removed. As a company practice, our goal is to accredit all of our facilities, even if it is not required by the facility's contract.

8. Identify custody level(s) of inmates you currently manage.

GEO Response: Minimum to maximum security levels.

9. Identify custody level(s) of inmates you have managed in the last 5 years.

GEO Response: Minimum to maximum security levels.

10. How many total inmates are you contracted to manage?

GEO Response: 47,018 inmates in correctional facilities.

11. Documented history of successfully transitioning from another private prison operator. Please denote the inmate population size and custody level.

GEO Response: GEO has successfully transitioned 41 facilities from other private prison operators.

Transitioned Entities/Facilities	Facilities	Capacity	Custody Level
Correctional Services Corp*	16	7,500	Minimum to Medium
Cornell Companies*	11	14,811	Minimum to Maximum
LCS Corrections*	8	6,500	Low to Medium
Graceville, Florida	1	1,884	Minimum to Close
Lawrenceville, Virginia	1	1,536	Medium
Sanders Estes, Texas	1	1,040	Minimum
Bay, Florida	1	985	Minimum to Medium
Moore Haven, Florida	1	985	Minimum to Medium
Cleveland, Texas	1	520	Minimum
Total	41	35,761	

* Acquisition of a company that included transitioning multiple facilities simultaneously from the previous operator to GEO.



12. Do you have the resources and ability to successfully assume responsibility for this contract within 60 days, 90 days, 120 days? Please describe in detail.

GEO Response: GEO requires approximately 45 to 60 days for the transition period. The GEO Corporate Headquarters comprised of approximately 275 staff will coordinate with the GEO Western Regional Office headed by a Regional Vice President and approximately 14 staff who will undertake and complete the successful transitioning of the Kingman, Arizona facility. The Western Regional Vice President, James Black, shall be the lead Transitional Coordinator, using his Western Regional Office subject matter experts in security, medical, programs, financial management, human resources, physical plant, information technology, compliance and risk management.

The Western Regional Human Resources staff will be assisted by the Corporate Human Resources department regarding employee recruitment, interviews, offer letters, placement on payroll, and enrollment in insurance and other benefits. If needed, GEO can draw on the expertise of our correctional professionals and operational managers from field locations throughout the country.

13. What are the qualifications of the proposed correctional institution leadership team?

GEO Response: GEO's preliminary candidates for the correctional institutional leadership team are as follows:

Position	Name	Correctional Experience
Complex Warden	Jeffrey Wrigley	36 years with GEO and the BOP
Deputy Warden	Gerald Morris	31 years with GEO and TDCJ
Warden – Hualapai Unit	Edward Coday	18 years with GEO and IN DOC
Associate Deputy Warden – Hualapai Unit	John Palosaari	28 years with ADC and MTC
Chief of Security – Hualapai Unit	Ronald Warren	13 years with GEO, GA DOC, CCA
Warden – Cerbat Unit	Kirk Duggan	23 years with GEO and ADC
Associate Deputy Warden – Cerbat Unit	Terry Johnson	20 years with ADC and Pinal County
Associate Deputy Warden – Cerbat Unit	Christopher Carney	18 years with GEO
Chief of Security – Cerbat Unit	Tony Schwartzkopf	10 years with MTC

14. Do you have the project management experience to oversee the timely and acceptable completion of needed repairs? Please describe in detail.



GEO Response: GEO has a Project Development Division headed by Tom Wierdsma, Senior Vice President, with approximately 40 years of experience. Mr. Wierdsma has numerous subject matter experts in correctional design, facilities maintenance, and project management and has overseen the development and construction of dozens of correctional/detention facilities for GEO. The Project Development Division oversees not only new projects but also capital expenditures for repairs and renovations to all of our operational facilities.

Our staff includes experts in the development, design and facility management of security systems and services, medical systems and services, food preparation/delivery systems and services, facility maintenance, and information technology which work together for timely completion of needed repairs. This unique approach of having operational experts working along with the design, construction, and facility management experts results in a well-developed, efficient facility operation suitable for its intended use and reasonable in cost to construct, renovate, maintain, repair and operate.

All GEO team members, whether operational or project development experts, are highly knowledgeable and experienced in new, renovated, and operational correctional and residential treatment facilities for federal, state and municipal governments. The GEO Project Development Division presently oversees approximately 100 facilities totaling over 84,000 beds, valued in excess of \$3 billion.

15. Describe your organization's experience with inmate educational, vocation and treatment programs similar to those offered at ASP-Kingman.

GEO Response: GEO has reviewed the Kingman program offerings listed on the MTC website. We can definitively affirm that GEO provides similar programs as those offered at Kingman at many of GEO's 104 facilities.

Worldwide, GEO has as many as 30,000 offenders participating in programmatic activities on a daily basis in our correctional, detention and re-entry facilities in the United States, Australia, South Africa, and the United Kingdom. On any given day GEO has more than 15,000 individuals participating in programmatic activities in our domestic correctional facilities alone. In 2014, offenders in GEO facilities achieved 745 GEDs; 6,264 vocational certificates; 7,610 substance abuse program completions; and 15,189 Life Skills and Cognitive Behavior program completions.

The GEO Group has been providing evidence-based programming in correctional facilities for numerous years. The company provides a variety of academic programs from special needs to college courses. Vocational programs (including NCCER certified courses) provide technical skills for offenders to secure

employment upon release. Behavioral programs include Thinking for a Change, Moral Reconciliation Therapy (MRT), anger management, parenting (including InsideOut Dad), various life skills and more.

Substance Abuse plays a major role in criminal activity and GEO provides evidence-based treatment programs in a variety of settings to include Therapeutic Community, Intensive Out-Patient Programs, and individual counseling.

GEO also provides a number of programs to meet the offenders' faith requirements. Relying on our professional staff and trained volunteers, GEO provides faith (and character)-based dorms, pro-social role models, and additional transition programming.

Examples of Rehabilitation Programs Provided by GEO:

- General Education (GED)
- Adult Basic Education, Literacy Programs, Special Education
- College Enrollment
- Substance Abuse Treatment
- Moral Reconciliation Therapy
- Thinking for a Change, Phoenix New Freedom Anger Management
- Life Skills Programs (including Financial Management, Employment Skills)
- InsideOut Dad
- Faith-Based Programs
- Pre-Release Programs
- Vocational Programs
 - National Center for Construction Education & Research Programs
 - Cabinet Making, Culinary Arts, Janitorial, Computer Lab/Programs
 - Wheels for the World, CDL (Commercial Driver's License)
 - Plumbing, Electrical, HVAC, Carpentry, Welding, Painting, Masonry
 - Barbering/Cosmetology, Horticulture, Small Engine Repairs

16. Describe your organization's experience in managing inmates under the Arizona Department of Corrections.



GEO Response: GEO presently manages three (3) facilities for the Arizona Department of Corrections: Central Arizona Correctional Facility (1,280 beds), ASP-Florence West (750 beds), and ASP-Phoenix West (500 beds). GEO has been successfully managing these facilities since 2005. During GEO's 10 years of management, there have been no major disturbances, suicides, or homicides at our Arizona facilities. Further, GEO has consistently achieved the minimum staffing requirements for each facility.

GEO has undergone numerous successful audits including yearly audits and assessments by ADC. GEO consistently scores in the 90s and maintains ACA accreditation for each facility although not required by our ADC contracts.

The 1,280-bed medium security Central Arizona Correctional Facility is located in Florence and opened in 2006. Programs include Functional Literacy, GED, Cognitive Restructuring, Re-entry, Conflict Resolution, Cultural Diversity, Domestic Violence, Sex Offender Education Treatment, Work Based Education, and Work Incentive Pay Programs. In addition, a 12 month Waste Water and Collection Program facilitates those inmates who wish to prepare for the Level 1 or Level 2 State Certification Exam through the Arizona Department of Environmental Quality (ADEQ). Also, the facility has collected over \$27,000 to contribute to the Restorative Justice Service through fundraising.

ADC Audits: 2010 – score 99%
 2011 – score 97.2
 2012 – score 94.9
 2013 – score 94.9
 2014 – score 93.1

The 750-bed DUI/RTC minimum security ASP-Florence West is located in Florence and opened in 1997. Programs include Substance Abuse, Functional Literacy, GED, Cognitive Restructuring, Re-entry and Work Incentive Pay Programs. In addition, approximately 75 inmates depart Florence West daily to work at various positions throughout the local area, providing janitorial and landscaping services. We have successfully maintained our licensing with Arizona Board of Behavioral Health as a licensed outpatient facility.

ADC Audits: 2011 – score 96.5%
 2012 – score 97.4%
 2013 – score 97.6%



2014 – score 94.3%

The 500-bed DUI minimum security ASP-Phoenix West facility is located in Phoenix and opened in 1996. Programs include Substance Abuse, Functional Literacy, GED, Cognitive Restructuring, Re-entry and Work Incentive Pay Programs. Approximately 110 inmates depart PHX WEST daily to work at various positions throughout the greater Phoenix area, providing janitorial and landscaping services at the Capitol, street maintenance with Arizona Correctional Institute, recycling at the Sanitation Department, conducting maintenance and brush clearing for the Fish and Game Department, and cleaning vehicles and providing preventive maintenance for the Transportation Department.

ADC Audits: 2011 – score 97.1%
 2012 – score 96.4%
 2013 – score 94.8%
 2014 – score 93.1%

During the past 10 years, GEO has made significant improvements to the physical security features of each of the Arizona facilities to include:

- Repair and replacement of the underground cable alarm system at Central Arizona.
- Addition of monitoring cameras at each of the Arizona facilities.
- Additional razor wire added at Florence West to upgrade perimeter security.
- Installation of a microwave perimeter detection system at Florence West and at Central Arizona to provide redundant perimeter detection systems.
- Installation of modern touch screen security electronic controls at Central Arizona.
- Installation of the Guard Tour electronic recording system to capture and record staff rounds in the segregation units to ensure 30 minute health and welfare, and security checks of each inmate confined in restricted housing.



17. Within the last 10 years, have you been declared in material breach or default of a private prison contract? Also, within the last 10 years, has there been a claim on a performance bond associated with a private prison that you operated? Please provide an explanation for all "yes" answers.

GEO Response: No.

18. Describe your organization's financial capability to manage this contract.

GEO Response: GEO has an enterprise value of approximately \$4 billion, assets of approximately \$3 billion and a financial bank facility of \$1.2 billion, which includes a \$700 million revolving line of credit. GEO expects 2015 revenues to be approximately \$1.9 billion and earnings before interest, taxes, depreciation, and amortization of approximately \$375 million. We have full and proven access to both the bank and capital markets as necessary. Accordingly, GEO is uniquely capable of financially managing the Kingman contract.

19. Can your organization provide all insurance and payment and/or performance bonds required by the ASP – Kingman Contract and Management Agreement as of the Assignment Effective Date?

GEO Response: Yes.

20. Confirm that your organization can and will comply with ALL requirements in the ASP – Kingman Contract and Management Agreement?

GEO Response: Yes.



GEO Experience in and Method of Delivering Health Care Service

GEO has extensive experience in delivering full medical, dental, pharmacy and mental health services since 1987. We are presently responsible for the provision of full medical care at 39 facilities of which 13 are provided by our subcontractor Correct Care Solutions (CCS). GEO's health services are overseen at the corporate level by our Executive Vice President for Health Services and Chief Medical Officer, Dr. Ada Rivera. Dr. Rivera has over 30 years of health care experience with GEO, the Bureau of Prisons, Immigration Customs Enforcement, and U.S. Public Health Service. She is assisted at the corporate level by a Vice President and five (5) health care subject matter experts. Additionally, the Corporate Health Services Division oversees health care staff assigned to GEO's three (3) regional offices who in turn oversee the health care staff at the facility level.

All 39 facilities at which GEO oversees health care have been accredited by the American Correctional Association (ACA). In addition, ten (10) GEO facilities are accredited by the National Commission on Correctional Health Care (NCCHC), and seven (7) federal facilities are accredited by The Joint Commission (TJC). Health care at the three (3) GEO Arizona facilities is subcontracted to CCS and accredited by ACA. In addition, the Central Arizona facility health care is accredited by NCCHC. All three GEO Arizona facilities provide full medical, dental, pharmacy, and mental health services.

With regard to quality control, each facility is audited annually by the Corporate Health Services division and twice a year by GEO's Contract Compliance division. Performance Improvement Reports are initiated on a quarterly basis at the facility level and submitted to the Corporate Health Services Division for review. On a daily basis each facility health services administrator coordinates their activities with the Regional Health Services Director. Any special health care incidents are reported promptly to the Regional Office.

GEO has established networks of specialty service providers in each community in which we operate. These networks ensure we are able to provide all medical services that may be needed by an inmate during incarceration. The GEO Corporate Health Services division negotiates separate service agreements with hospital providers to ensure timely and cost effective health services. At the facility level only medical staff make medical decisions in order to ensure the greatest safety of the inmates and achieve medical autonomy. With respect to pharmacy, the majority of the GEO facilities use Correct Rx.

With ADC approval and following appropriate termination notice, GEO intends to subcontract the medical services at Kingman to CCS as we do at our current Arizona facilities. GEO will work with the current medical contractor to ensure a seamless transition of the medical services to CCS.



GEO's Experience in and Method of Delivering Food Service

GEO provides over 158,000 high quality wholesome meals daily to over 52,800 residents at nearly 50 correctional and detention facilities in the United States. GEO food service operations are supported by regional and corporate staff including operations managers, menus specialists, medical professionals, IT specialists, physical plant specialists, purchasers, registered dietitians and support staff. GEO's food services are overseen at the corporate level by a Vice President of Administration who is assisted by a staff of seven (7) subject matter experts including a Registered Dietician and three (3) Regional Food Service Managers. This professional staff allows for flexibility and real time solutions to challenges as they arise; such as expedited menu changes to meet resident and client expectations, expeditiously addressing medical and religious issues, and ensuring non-functioning equipment is repaired or replaced in a timely fashion.

GEO is subject to numerous audits including client audits, ACA accreditation audits, local government health department inspections, and a rigorous internal audit program that ensures compliance with key food service operational standards as well as compliance with contractual obligations and deliverables. Facility food service managers are ServSafe Manager Certified and GEO has implemented an extensive Management in Training Program to ensure new managers are properly trained in all aspects of institutional food service management. GEO has implemented an automated enterprise food service management solution which integrates menu creation, recipes, product specifications, purchasing, inventory, production and meal counting thereby achieving higher quality meals at better prices resulting in value to the client.

GEO is well versed in Arizona Department of Corrections (ADC) food service as GEO directly operates food service at the three GEO Arizona facilities. GEO will operate ASP-Kingman food service in compliance with the ADC Department Order Manual for Food Service ensuring all staff and inmate workers are medically cleared, sanitation standards are met, and security requirements are adhered to. GEO will utilize an ADC approved menu with special attention (and training) paid to medical, religious, and enhanced meals/diets. Food service will be delivered via institutional food production methods, an internal tray serving line within a pleasant dining hall environment. Special meals/diets will be trayed separately ensuring compliance with ADC food service requirements.

In an effort to minimize the impact on the new operator transition, GEO intends to continue to utilize the current food service contractor for a period of time adequate to evaluate their performance, effectiveness, cost and inmate/ADC satisfaction. If it is determined that the subcontractor does not meet GEO or ADC standards GEO will seek ADC approval to transition to a GEO directly operated food service department.

2. Transition Plan

GEO requires approximately 45 to 60 days for the transition period. The GEO Corporate Headquarters comprised of approximately 275 staff will coordinate with the GEO Western Regional Office headed by a Regional Vice President and approximately 14 staff who will undertake and complete the successful transitioning of the Kingman, Arizona facility. The Western Regional Vice President, James Black, shall be the lead Transitional Coordinator, using his Western Regional Office subject matter experts in security, medical, programs, financial management, human resources, contract compliance, physical plant, information technology, compliance and risk management.

The Western Regional Human Resources staff will be assisted by the Corporate Human Resources department regarding employee recruitment, interviews, offer letters, placement on payroll, and enrollment in insurance and other benefits. If needed, GEO can draw on the expertise of our correctional professionals and operational managers from field locations throughout the country. Our corporate staff and critical Regional team members will be available on-site to provide additional resources and technical assistance during the entire transition process. We expect the Kingman employee interviews will be completed within the first two weeks of the transition period leading to formal job offers. Concurrently, GEO will be initiating a broader recruitment effort for any additional staff that will be necessary.

GEO's proposed leadership team for Kingman includes a Complex Warden who will oversee a Deputy Warden and two Unit Wardens who will work in coordination to oversee the facility. GEO believes strongly in the team concept and understands a large correctional complex needs to operate as one highly functional unit. GEO has extensive experience in managing facilities of a similar size and complexity as ASP-Kingman. GEO will provide all necessary personnel and services for a smooth transition from the current contractor effective January 1, 2016 or sooner.

GEO has identified critically important issues that will be addressed and achieved during the transition process. These issues include:

- **The identification and selection of key staff to effectively manage and provide the prescribed programs.** GEO will work with the current contractor, local, state, and facility authorities to identify and select the most qualified individuals to provide the required services. The final management team will be seasoned correctional professionals who have the ability to communicate effectively with both staff and inmates. GEO fully understands strong leadership plays a critical role in employee retention and operational excellence.
- **Continued employment for current facility staff.** GEO recognizes the importance of stability of daily routine within a correctional environment, including the need to maintain sound security operations. Our goal is to identify and retain as many of the current qualified staff as possible to ensure a seamless transition in operations. GEO will make every effort to retain qualified incumbent personnel. If awarded the contract, GEO representatives will meet informally with incumbent staff to provide information and



answer questions regarding our company. The meetings will allay any fears associated with the potential transition to a new employer and will serve as a friendly introduction to GEO in an effort to retain the maximum number of qualified incumbent employees. As is our experience with previous contract transitions, we anticipate the vast majority of incumbent personnel will be retained during the contract transition. Our goal is to maintain full staffing at the completion of the transition with no disruption to operations. GEO is an excellent employer and offers competitive wages and outstanding employee benefits. We have teams who have extensive experience in transitioning large organizational units from other vendors to GEO operations.

- **Recruiting new qualified staff.** GEO is dedicated to attracting, training, developing, and retaining the most professional workforce in the industry. The experience gained in successfully attracting and retaining employees at over fifty correctional and detention facilities around the world will be utilized to ensure successful transition. In an era of tight labor markets, GEO strives for stability and also retention of valuable employees. In addition, training emphasizes the need for staff to take ownership in daily operations which bolsters employee confidence. We recognize the important role wage rates and employee benefit packages play in retention of employees. GEO will provide salaries and benefits that are commensurate with the market requirements for the Kingman area.
- **Training staff on correctional basics, inmate intelligence, and proper communications with the inmate population.** A well developed and job-related training program prepares employees to become successful in the corrections industry. GEO is committed to providing its employees with quality pre-service, in-service and career development training programs necessary to ensure success. We reinforce the importance of understanding and executing core correctional basics and strong communication skills with inmates daily. Additionally, GEO knows many emergency situations can be avoided if employees are well trained and familiarized with inmate behavior, as it relates to intelligence, sharing of observations, and situational awareness.
- **Adaptation and implementation of company policy, procedures, post orders, and building schedules to existing procedures and current contractual requirements.** All GEO facilities operate in compliance with established policies and procedures developed in coordination with, and approved by, appropriate oversight officials. GEO will tailor all proven and effective policies to comply with the requirements of this contract and will operate in compliance with all ACA, PREA, and State of Arizona contractual requirements. GEO will make all transitional changes as seamless as possible, and do so without upsetting current operational flow of the facility or conflict with monitoring processes.
- **Implementation of the industry's best emergency preparedness plans and measures.** GEO is the industry leader in emergency preparedness measures and operational readiness. Our goal is to train and prepare all staff for a precise and well trained response if critical events ever occur. Our company security experts will develop comprehensive, site-specific, emergency action plans to respond to disruptive activities and emergency situations. We will enhance existing plans staff have trained on and improve response measures through training and development of a more comprehensive model. Plans will



include use of DART teams and the ICS model as well as having access to GEO response teams at other nearby contracts that will be able to assist expeditiously if events occur.

- **Identification and assimilation of current local service and supply providers.** GEO will use as many local suppliers and service providers as possible in order to ensure continuity of services and continued support to local businesses. Our goal is to be a good business partner in the local community and to work with existing vendors to assure proper continuity of service. GEO is the leader in private corrections and has worked with many of the existing national vendors currently at ASP-Kingman. Bringing value and quality services to our client's needs is GEO's primary goal in vendor selection.
- **Implementation of the industry's strongest quality control plans.** GEO is a leader in quality improvement and monitoring of critical operational standards. GEO has established an independent Contract Compliance Division that reports directly to the GEO Chairman and CEO. This division conducts audits of each GEO facility at least once annually. Written reports are distributed to the facility, regional office, and the corporate Senior Vice President of Operations.

The Kingman Quality Control Plan (QCP) will incorporate all unique contract requirements for this project to include compliance with ACA and PREA standards. The QCP goes beyond contractual requirements, striving to meet the highest industry standards of correctional excellence. The QCP will be submitted to the ADC contracting officer upon request.

- **Inmate services transition, work assignments, and communication.** GEO understands the importance of executing a seamless transition for the inmate population from the existing provider to full GEO operations. The GEO operational team will communicate openly with the inmate population, alleviating any potential uneasiness during the change in operators. Food Service and commissary operations, inmate programming, visitation, and all areas impacting inmate services will be a focus of GEO's transitional team and leadership. Our company understands inmate idleness can result in a safety issue in a correctional environment. GEO is committed to improving existing educational and work programs so inmate time is better utilized and inmates are better prepared for returning home.
- **Establishment of local community relationships.** GEO's experience has demonstrated the importance of solid community partnerships in the successful operation of our programs and facilities. GEO will be an active participant in the local Chamber of Commerce and in support of local charities.

3. Amendment Acknowledgement

In addition to the original Framework and Schedule for Vendor Responses and accompanying documentation, GEO has received and acknowledges the following documents regarding the assignment of the Management & Training Corporation (MTC)/Arizona Department of Corrections (ADC) Contract No. AD9-010-A3 and the MTC/Mohave Prison, LLC Management ASP-Kingman contract:

- Kingman EOI – Vendor Answers (received Friday, September 18, 2015) along with 11 attachments



4. Compliance with Additional Operational Requirements

GEO has reviewed the Potential Assignee Additional Operational Requirements and provides the following responses:

1) Training

- COs
 - COTA
 - Pre-Service for ALL (except those currently attending)
- All Others
 - 2016 Refresher/In-Service
- Mandatory TSU and DART Training

GEO Response: GEO will ensure that all COs attend COTA Pre-service training. All other staff will receive 2016 Refresher/In-service training delivered by ADC certified instructors already on staff from other Arizona facilities including mandatory TSU and DART Training.

Specialized Training - Dependent on Job Duties:

- ADOA Supervisory Academy Armorers' School
- Chase Academy
- Community Corrections Academy (CCA) Contract Monitor Academy (CBM)
- Correctional Officer 111 Academy
- OSHA Academy
- Special Security Unit Academy (SSU) Sergeants' Leadership Academy (SLA)
- TSU Academy - Tactical Support Unit Visitation Officer Training

CO-III and CO-IV Specialized Training:

- Classification Certification/Recertification (Classroom)
- Corrections Plan (Computer-based)
- Group Dynamics (Classroom)
- Merging Two Worlds (Classroom)
- Motivational Interviewing (Classroom)
- Thinking for a Change (Classroom)

2) Operate Prison as One Complex, Not Independent Units

GEO Response: When selected, GEO will operate the prison as one complex with a single senior management team, implementing effective communication and coordination procedures to ensure that all units of the complex work cohesively. GEO's proposed



leadership team for Kingman includes a Complex Warden who will oversee a Deputy Warden and two Unit Wardens who will work in coordination to oversee the facility.

3) Staffing

- ADC Approval of Wardens, DWs, ADWs and Chiefs of Security
- SSU
 - Existing position in staffing pattern increased to Lt. and must be dedicated to this function.
 - Add 2 Sgts.: 1 at each unit (dedicated as well)
- K-9 Handler/Narcotic Detection Dog (Team)

GEO Response: GEO acknowledges and agrees that Wardens, Deputy Wardens, Associate Deputy Wardens and Chiefs of Security will be approved by ADC. Further, the SSU position will be increased to a Lieutenant and will be dedicated solely to the SSU function. Two (2) sergeants will be added, one at each unit, as requested. Finally, a K-9 Handler/Narcotic Detection Dog (Team) will be established.

4) Physical Plant

- Nature and extent of willingness to pay for security upgrades

GEO Response: GEO has demonstrated its willingness to provide security upgrades to our current contracted facilities with ADC as reflected by the following:

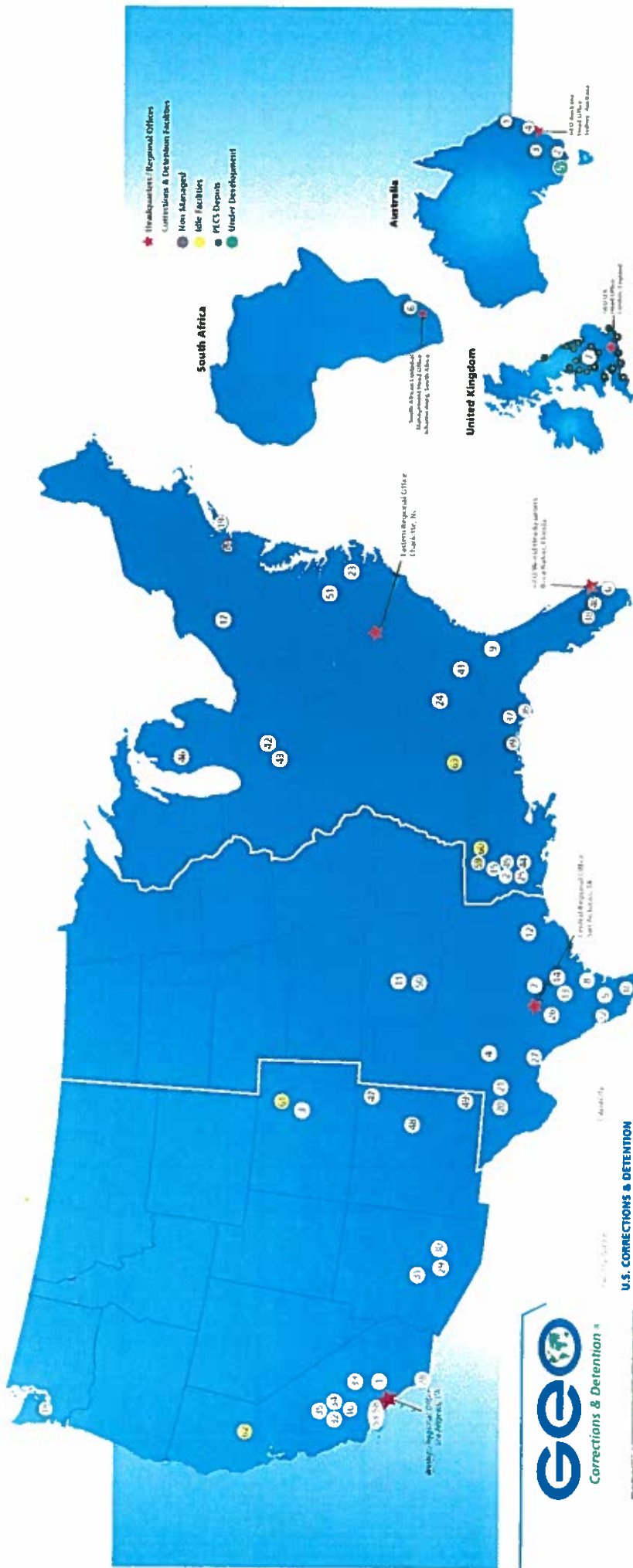
- Repair and replacement of the underground cable, perimeter alarm system at the Central Arizona facility;
- The addition of video cameras at each of GEO's Arizona facilities;
- The installation of a microwave perimeter detection system at both the Florence West and Central Arizona facilities to provide an enhanced, redundant perimeter alarm system;
- Installation of additional razor wire at the Florence West facility to improve perimeter security;
- Installation of modern touch screen security electronics controls at the Central Arizona facility;
- Installation of the Guard Tour electronic recording and tracking system in each segregation unit to ensure 30 minute health and welfare and security checks of each inmate.

GEO is committed to providing Operational excellence through sound physical security features and operational security practices. We are receptive to making security upgrades to facilities to ensure we achieve the best results for the ADC, and to provide for the safety and security of staff, inmates and the public.

5. Attachments/Appendix

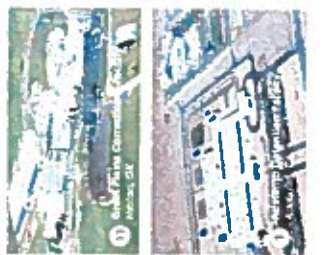
GEO has included the following Attachments in this section of our response:

- Attachment A – map of GEO Corrections & Detention locations
- Attachment B – map of GEO Care locations



U.S. CORRECTIONS & DETENTION

State	Facility Name	Location	Capacity
Alabama	Alabama State Prison	Montgomery, AL	1,000
Alaska	Alaska State Prison	Juneau, AK	100
Arizona	Arizona State Prison	Phoenix, AZ	1,500
Arkansas	Arkansas State Prison	Fayetteville, AR	1,200
California	California State Prison	Folsom, CA	2,000
Colorado	Colorado State Prison	Denver, CO	1,800
Connecticut	Connecticut State Prison	Hartford, CT	1,100
Delaware	Delaware State Prison	Dover, DE	800
District of Columbia	District of Columbia State Prison	Washington, DC	1,000
Florida	Florida State Prison	Tallahassee, FL	1,500
Georgia	Georgia State Prison	Atlanta, GA	1,200
Hawaii	Hawaii State Prison	Honolulu, HI	500
Idaho	Idaho State Prison	Boise, ID	1,000
Illinois	Illinois State Prison	Joliet, IL	1,800
Indiana	Indiana State Prison	Indianapolis, IN	1,500
Iowa	Iowa State Prison	Des Moines, IA	1,200
Kansas	Kansas State Prison	Topeka, KS	1,000
Kentucky	Kentucky State Prison	Louisville, KY	1,100
Louisiana	Louisiana State Prison	Baton Rouge, LA	1,500
Maine	Maine State Prison	Bangor, ME	800
Maryland	Maryland State Prison	Annapolis, MD	1,000
Massachusetts	Massachusetts State Prison	Worcester, MA	1,200
Michigan	Michigan State Prison	Lansing, MI	1,500
Minnesota	Minnesota State Prison	St. Paul, MN	1,800
Mississippi	Mississippi State Prison	Jackson, MS	1,000
Missouri	Missouri State Prison	Jacksonville, MO	1,200
Montana	Montana State Prison	Helena, MT	800
Nebraska	Nebraska State Prison	Lincoln, NE	1,000
Nevada	Nevada State Prison	Las Vegas, NV	1,500
New Hampshire	New Hampshire State Prison	Manchester, NH	800
New Jersey	New Jersey State Prison	Trenton, NJ	1,200
New Mexico	New Mexico State Prison	Albuquerque, NM	1,000
New York	New York State Prison	Albany, NY	2,000
North Carolina	North Carolina State Prison	Raleigh, NC	1,500
North Dakota	North Dakota State Prison	Bismarck, ND	800
Ohio	Ohio State Prison	Columbus, OH	1,800
Oklahoma	Oklahoma State Prison	Norman, OK	1,200
Oregon	Oregon State Prison	Medford, OR	1,000
Pennsylvania	Pennsylvania State Prison	Harrisburg, PA	1,500
Rhode Island	Rhode Island State Prison	Providence, RI	800
South Carolina	South Carolina State Prison	Columbia, SC	1,200
South Dakota	South Dakota State Prison	Spearhead, SD	800
Tennessee	Tennessee State Prison	Memphis, TN	1,500
Texas	Texas State Prison	Houston, TX	2,000
Utah	Utah State Prison	Salt Lake City, UT	1,000
Vermont	Vermont State Prison	Winooski, VT	800
Virginia	Virginia State Prison	Richmond, VA	1,200
Washington	Washington State Prison	Spokane, WA	1,500
West Virginia	West Virginia State Prison	Martinsburg, WV	800
Wisconsin	Wisconsin State Prison	Madison, WI	1,800
Wyoming	Wyoming State Prison	Cheyenne, WY	800



GEO Corrections & Detention

4. Delivery of Service Approach

CCS Accreditation Detail

CCS currently provides correctional healthcare services in 169 accredited facilities. *We have never failed to obtain nor lost accreditation status at any of our client sites.* The following table shows a summary of our current accreditation status.

CCS Accreditations by the Numbers	
Accrediting Agency	Number of Facilities
NCCHC, ACA, and CALEA (Triple Crown)	13
NCCHC and ACA	15
NCCHC Only	47
ACA Only	94
TOTAL	169

ADOC Facilities subcontracted to CCS

Currently three ADOC facilities are subcontracted to CCS for the provision of healthcare.

- Arizona State Prison, Florence West
- Central Arizona Correctional Facility
- Arizona State Prison, Phoenix West

Recruiting Capabilities

CCS focuses on prudent staff deployment in order to promote high efficiency, fewer mistakes, and improved morale. As a result, we have an excellent retention rate with low turnover. In order to consistently recruit and retain highly qualified employees, CCS has developed industry-leading employee retention programs, including competitive benefits programs and opportunities for professional development. By showing our employees that they are a valued part of our company, CCS is able to save our clients unnecessary operational expense and added costs created by turnover.

Recruiting Practices

The CCS Home Office in Nashville provides on-site support to our clients through our Human Resources department, which facilitates the recruitment, development, and retention of healthcare professionals in our client communities. Our dedicated team of Recruiters, Sourcing Specialists, and Coordinators assist our staff and clients with finding high-potential candidates, screening applications, conducting interviews, and making hiring decisions. CCS continually researches rates of pay in our client areas to ensure that our salary ranges remain competitive. When a vacancy occurs, we immediately begin recruiting, both within the community and within CCS through external and internal proactive efforts. Hiring Managers work with a dedicated Recruiter and the CCS recruiting team to post any open positions in our Applicant Tracking System (ATS). The Hiring Manager and Recruiter can subsequently view applicants' information in the ATS. The following figure illustrates the CCS recruiting process in five steps.

Step 1	Staffing Requisition
• Once a Hiring Manager identifies a recruitment need, a job requisition is created in our Applicant Tracking System (ATS).	
Step 2	Position Posted
• CCS Recruiters post the job opening both internally and externally and initiate additional sourcing of candidates as the position requires.	
Step 3	Review Applicants
• Applicants are reviewed within 48 hours of their application by the Hiring Manager or the Recruiter. Applicants are contacted or moved within the system to the next step in the process.	
Step 4	Interviews
• The Hiring Manager or the Recruiter will coordinate interviews with all qualified candidates. Telephone and in-person interviews are conducted and the decision to extend an offer is made.	
Step 5	Offer Letter and Screening
• The Hiring Manager or the Recruiter sends an Offer Letter. Once the offer is accepted, the New Hire process begins, including paperwork, credentialing, drug screening, background check, etc.	

The CCS Recruiting Process. CCS uses a five-step process to identify, properly vet, and hire qualified applicants.

Internal Recruiting

CCS posts all job openings within the company first so that internal team members have the opportunity to be considered before opportunities are posted externally. CCS employees are eligible to apply for internal opportunities after completing six months in their current role, provided they are in good standing. If a team member is interested in transferring to another position and/or location, they must complete an internal transfer request form and submit it to their supervisor for signature before applying for the position. Interviews are typically conducted by the Hiring Manager or regional staff. CCS also welcomes input from our clients during the interview process for key positions.

College and University On-site Recruitment

A key part of the CCS recruitment plan includes reaching out to local nursing schools to attract healthcare professionals to a career in corrections. CCS has developed programs for nursing students in several of our client facilities.

- CCS successfully partnered with the University of Kansas to develop a rotation for students in the Nurse Master's Program.
- CCS partnered with Creighton University in Omaha, Nebraska to develop a correctional nurse training curriculum and rotation.
- In the State of Delaware, CCS developed a correctional clinical rotation for University of Pennsylvania Advanced Registered Nurse Practitioners at the Howard Young Correctional Institution in the Delaware Department of Corrections.

- In Kansas and Nebraska, Mental Health Professionals have completed internships working with CCS Mental Health providers.

These are just a few examples of the local programs CCS has developed in our local communities. We have found that by increasing community interest and education regarding corrections, we have been able to attract and recruit healthcare providers who may have otherwise overlooked a career in our industry.

National Searchable Databases

CCS uses a wide variety of national recruiting databases that provide access to healthcare professionals throughout the country, including:

- CareerBuilder.com
- Indeed.com
- MiracleWorkers.com
- PracticeLink.com
- PracticeMatch.com
- DocCafe.com
- NurseCafe.com
- DentistJobsCafe.com

CCS also uses resources that blast job postings and information across dozens of other recruiting databases and job sites through a single source. Our strategic use of various databases ensures a continuous feed of the newest resumes and candidates into the Workforce System that our recruiters use to quickly identify the strongest candidates.

CCS Employee Retention and Benefit Program

We value all our employees and recognize the importance of not only attracting the best candidate, but retaining that person as a valued CCS employee. CCS offers a competitive benefits package to all of our valued employees. ***CCS benefits will begin immediately for retained staff***, consistent with the current status of the employee's benefits eligibility.

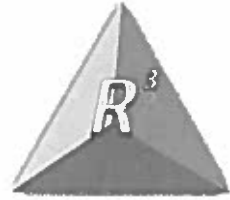
CCS will offer competitive salaries and benefits to all employees with a focus on hiring and retaining qualified staff. We conduct local due diligence and salary surveys to ensure that our proposed rates are competitive within the surrounding area and to ensure that staff recruitment and retention efforts are successful. Our goal is to retain all qualified, properly credentialed individuals who have the attributes to succeed as a part of our team. ***CCS will ensure the compensation offered to these employees is at least equivalent to what they are currently receiving***, including providing full benefits on day one for those employees who qualify for full benefits in their current position.

CCS understands the importance, for continuity of care, of ensuring the majority of our employees are full-time employees. Consistent staffing improves the quality of patient care and minimizes issues that can lead to grievances and lawsuits. CCS offers benefit-related incentives to entice those who may be looking at a slightly higher rate of pay as per diem staff to commit to full-time employment with our Company. Any open positions are temporarily filled through overtime and PRN staffing pools.

Following is an overview of CCS benefit programs designed to assist our employees.

Employee Recognition

CCS has a formal Employee Recognition Program based on our company slogan: “The *Right* People Doing the *Right* Things *Right*.” The program, known as “R³ Recognition,” is designed to reward employees for outstanding performance and exemplary service. The purpose of the Employee Recognition Program is to motivate positive job behavior and build a sense of pride in each employee. CCS presents recognition awards each quarter based on attendance, customer service, teamwork, and overall performance.



Professional Development/Tuition Assistance

CCS encourages employees to take advantage of opportunities for advancement and professional growth. The CCS education and training program facilitates professional development and provides tuition assistance to employees as an opportunity to advance their skills and their career. In addition, on an annual basis CCS employees and their children who graduated high school are encouraged to apply for three CCS sponsored college scholarships.

Human Resources Hotline

CCS offers a 24/7 Human Resources hotline in the event guidance regarding an issue is needed outside of regular business hours.

GPS – Great People Skills

CCS believes that our employees have a valuable perspective and we are committed to fostering open communications of feedback and ideas. We regularly conduct employee surveys at our facilities and responses are overwhelmingly positive. Many employees have expressed excitement at having an official avenue to express their opinions.

Continuing Education Program

CCS maintains a continuing education program providing medical, nursing, and mental health personnel with access to programs on a monthly basis. The program ensures the availability of at least 40 hours of continuing education training annually. Medical, mental health, and nursing professionals are provided with both in-house and community opportunities for continuing education programs that are relevant to their work as correctional health providers. By encouraging our employees to take advantage of these opportunities, CCS is building an even stronger, more professional staff equipped to meet our clients' diverse needs.

Flexible Scheduling

When possible, CCS attempts to establish flexible scheduling to meet the needs of our employees. Through our backfill program, CCS will utilize properly trained part-time and per diem personnel to provide coverage for scheduled absences and to supplement the full-time staffing matrix.

Employee Assistance Program

CCS offers an Employee Assistance Program (EAP) through Aetna. All CCS employees and their household dependents have 24/7 access to a range of free services and educational materials to help with a variety of life/work challenges and crisis management. Assistance is available through a confidential

phone call or referral to a specialist for up to three sessions of in-person support. The Aetna EAP also gives employees access to a variety of discounted services and programs designed to promote health and wellness.

Dare to Care

Correct Care Solutions is dedicated to helping its employees during times of crisis. Through the establishment of the Dare to Care Employee Assistance Fund, employees of Correct Care Solutions, and their



eligible dependents, who are experiencing difficult times, can apply for economic assistance. Employees may be eligible for assistance when they experience economic hardship, are unable to afford housing, utilities, food, clothing and other basic living expenses because of a natural disaster; life-threatening illness or injury; and death or other catastrophic or extreme circumstances beyond the employee's control.

CCS started Dare to Care with a generous gift of \$50,000 and continues to support the fund by matching up to \$20,000 of employee donations annually. To date, the Dare to Care fund has provided over \$350,000 to CCS employees in need. CCS uses the Community Foundation of Middle Tennessee to manage all funds and award gifts, which keeps the application process private and ensures that requests for assistance are reviewed by an impartial and experienced third party.

Wellness Program

CCS places a great deal of importance on the health and well-being of our staff. Employees are encouraged to participate in the CCS Wellness Program, which offers exercise programs, healthy eating tips, and other initiatives that promote a healthy lifestyle. Various CCS sites offer incentives or contests to encourage employee participation in programs that create a healthier staff, including smoking cessation and weight control programs.



Benefits Package

The following table contains a brief summary of the CCS benefit package including the benefit, employee eligibility requirements, and the amount of coverage. The cost to employees for benefits is tiered based on the employee's level of income.

CCS Benefits Summary

Benefit	Eligibility	Amount/Coverage
Probation Period	Full-time honoree's hire date with CCS or prior company	
Vacation	Accrual begins immediately. Eligible for use after 90 days of employment.	Year one = 12 days
Sick Leave	Accrual begins immediately. Eligible to use after 90 days of employment.	Year one = 10 days
Holidays	Immediately eligible	10 company-paid holidays per year *
Military Leave	Immediately	2 weeks paid per year/difference between military pay and base salary
Funeral Leave	Immediately	Company pays for 3 days off for immediate family member.
Jury Leave	Immediately	Company pays the difference between jury pay and regular pay if scheduled work days are missed.
FMLA/LOA	Service date with prior company will drive FMLA date. Also offer 30-day personal leave of absence.	Up to 12 weeks in a rolling 12-month period for FMLA
Long-Term Disability	Immediately. See probation period. Pre-ex applies.	Pays 60% of monthly salary up to max of \$20,000. Benefits begin 180 days after covered injury or sickness.
Short-Term Disability	Immediately. See probation period. Pre-ex applies.	Pays 60% of weekly salary up to max of \$2500. Benefits begin after 8 days of injury or sickness.
Medical/Health Insurance	Immediately for retained employees during acquisition.	Multiple Aetna options, including PPO, HSA, and HMO plans. Provided for employees and dependents.
Prescription Benefits	Immediately for retained employees during acquisition.	Envision Rx. Offering a retail and mail order pharmacy benefit.
Dental Insurance	Immediately for retained employees during acquisition.	Aetna Dental. Provided for employees and dependents.
Vision Insurance	Immediately for retained employees during acquisition.	Aetna Vision. Provided for employees and dependents.
Basic Life and AD&D	Immediately for retained employees during acquisition.	1x annual salary up to max of \$500,000

CCS Benefits Summary

Benefit	Eligibility	Amount/Coverage
Voluntary Life	Immediately for retained employees during acquisition.	Can elect up to 5x annual salary up to max of \$1,000,000.
Family Life	Immediately for retained employees during acquisition.	Available with Voluntary Life. Benefit cannot exceed 50% of coverage. Spouse benefit in \$5000 increments up to max of \$250,000. Dependent benefit of \$10,000.
Tuition Assistance	After 6 months of service	Company will pay up to \$2000 in rolling 12 months
Employee Assistance Program	Available immediately	Through Aetna
Other Benefits	1) Wellness Program; 2) Flex plan for health and dependent care reimbursement; 3) Legal and Identity Theft Program	
Retirement/Pension, 401K, Employer Contribution	Eligibility is 1 st of the quarter following date of hire or date of acquisition.	Traditional 401k plan or Roth 401k through Mass Mutual

Utilization Management and Cost Containment

The CCS Care Management Program uses evidence-based guidelines to determine medical necessity as part of our approval process. The CCS Care Management Program is overseen by Vice President of Medical Affairs, Mohammed Illyas, MD, and is operationally managed by the Vice President of Care Management. Dr. Illyas and the Care Management team will work together with the Regional Medical Director and on-site medical personnel to ensure that inmates receive medically necessary healthcare services in the most appropriate healthcare setting.

The ADC Administration will be given login information for the Care Management system in order to access management information and monitor off-site scheduling and inpatient status. In addition, we can arrange for an automated daily report to be sent to the Superintendent or designee. The Care Management system will function alongside your prisoner management system, to ensure accurate reports for ADC Kingman administration. With our robust Care Management system, CCS can offer a level of automation and accuracy in reporting that none of our competitors can match.

CCS Care Management Program	
Feature	Description
Prospective Review (Prior Authorization)	CCS requires prior review and authorization of all non-urgent or non-emergent care of our patients. CCS clinicians follow NCCHC standards and correctional guidelines to review and approve services. The CCS Medical Director will initiate a second review if standards are not clearly met. Alternative treatment is only at the discretion and direction of a physician.
Concurrent Review	CCS will assign a Regional Care Manager to manage all off-site inpatient care on a daily basis through daily contact with the hospital. The CCS Care Management team is notified of inpatient admissions at the time of admission. CCS Regional Care Managers and Regional Medical Directors follow NCCHC standards, Interqual criteria, and correctional guidelines to review inpatient services daily. The CCS Medical Director of Care Management holds clinical rounds via telephone twice weekly to ensure inpatient stays are appropriate and meet national guidelines (Interqual Criteria) for continued inpatient stay. The CCS Medical Director, Regional Medical Director, and Regional Care Manager attend the clinical rounds discussion. As a result of this multidisciplinary approach, inpatients are well-managed and appropriate transitions of care are completed with improved accuracy.
Retrospective Review	The Care Management department and site leadership retrospectively review emergency care. CCS uses a retrospective review process to resolve claims issues, determine appropriateness of care post-delivery, and perform focused reviews. Additionally, CCS will perform focused reviews at the request of the provider.
Discharge Planning	CCS manages a robust discharge planning process, which begins at inpatient admission. The CCS Regional Care Manager works collaboratively with site clinical staff and hospital staff to ensure appropriate transitions of care. This partnership helps CCS to ensure that excellent care is continued from discharge through return to the facility.

CCS Care Management Program

Feature	Description
Chronic Care Management	CCS enrolls chronic care patients in specialized on-site programs designed to ensure the healthiest outcome for individual patients based on their health status. CCS holds chronic care clinics on-site to increase efficiency and reduce costs associated with transporting patients off-site.
Emergency Services	CCS does not require prior authorization for emergent services. Medical personnel may make emergency off-site referrals based on established guidelines and their professional interpretation of a patient's need. Off-site medical services exceeding the scope of the initial emergent episode are not covered. Unrelated, non-emergent diagnostic services or treatment initiated in conjunction with an emergent event requires prior authorization.
Third-party Payment	The CCS Care Management system includes information on payment responsibility for patient treatment costs. If a patient has third-party insurance or other payment options available, CCS will notify the off-site provider of the appropriate agency to invoice. Our Care Management system interfaces with our claims system, so if such invoices are inadvertently sent to CCS for payment, we will contact the off-site provider and advise them as to the appropriate location to resubmit their invoice for payment.

Following is a summary of the CCS Care Management process.

1. When an on-site provider determines that a resident may need community-based services, the provider uses the Care Management system to document and communicate the Consultation Request.
2. On a daily basis, our Corporate and/or Regional Medical Director will access the Care Management system to review requests and take one of the following actions:
 - a. Authorize a specific diagnostic or therapeutic modality
 - b. Recommend an alternative treatment plan
 - c. Request additional information
3. If it is determined that the requested service is medically necessary, the request is approved and an authorization number is established in the Care Management system, which automatically sends the authorization number to the site and to the CCS claims department.
4. Once the site receives an authorization number, an appointment can be scheduled within the system. Authorization numbers are only valid for a specific time period. CCS will communicate service approval to the community provider and will require pre-approval in order to assume financial responsibility for services rendered. CCS also verifies that all invoiced charges are appropriate. Since the system sends the authorization number to our claims department, they are able to review every invoice to ensure billing only for the approved services.
5. If a resident is released from custody prior to a scheduled appointment, CCS will notify the community provider that CCS and ADC are no longer financially responsible, and CCS will remove the pending appointment from the system.
6. The CCS Medical Director will review and address discharge summaries and medical recommendations that the community provider makes.

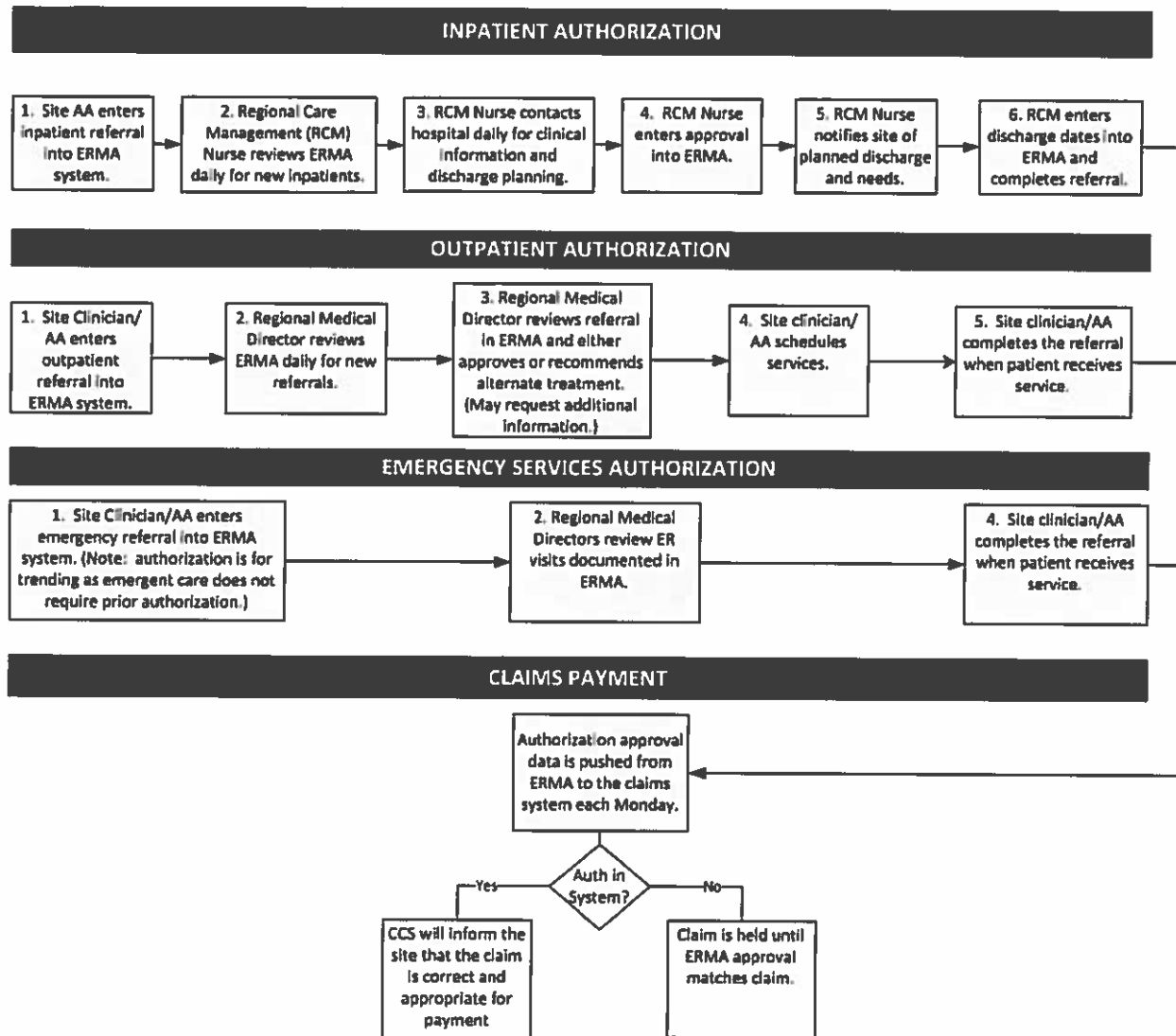
A Valuable Utilization

Management Tool for Clients

CCS provides our clients with complete access to the easy-to-use Care Management system, including real-time utilization reporting. CCS is fully transparent in our Care Management process, assuring our clients that only necessary off-site trips are being made.

Utilization Review

CCS uses an established review process to ensure that off-site referrals are medical necessary, and that any payments made are appropriate. We will coordinate, validate, and track off-site care and invoicing through the Care Management system, which generates reports that allow us to analyze the utilization of off-site services on behalf of our clients. CCS uses this data to assess the need for additional on-site and off-site services, as well as the potential impact that systems such as telemedicine may have. We will continuously evaluate both the number of cases as well as the costs associated with transporting residents in determining which clinics are held on-site. Constant evaluation of specialty services will ensure the most cost-effective solution for clinics.



The CCS Utilization Review Process. CCS will coordinate, validate, and track off-site care and invoicing through the Care Management system

Utilization Statistics

The CCS Care Management system is capable of producing reports containing detailed cost data for purposes of cost analysis and cost containment. These reports include information related to all medical, dental, and mental health services and associated costs, including laboratory, radiology, and other ancillary services; specialty services; pharmaceuticals; and medical supplies. CCS will analyze utilization statistics and continuously evaluate the potential benefits of establishing on-site clinics. Services brought on-site would typically result in cost savings for ADC as a result of clinic (rather than per patient) rates and decreased officer transportation expenditures. Please see the following sample Utilization Management report generated in the CCS Care Management system.

Inpatient Census Report

10/5/2014 - 10/6/2014 8:01:31 AM

Displays all inpatients between the Start Date and End Date and reflects the IP Days for that range. (The default IP Days Range will never reflect greater than two days.)

Inmate Type: N-None; S-State; F-Federal; CMP-Interstate Compact; ICE-ICE/INS

Site Name	Site Department	Name (Inmate Type)	Patent Number	DOB	Adm Date	Reg Inmate Date	Entry Date	Appt Date	Days From Entry	Disch Date	Hospital Name	Diagnosis	Total IP Days	IP Days Range
Baltimore County Detention Center	Baltimore County Detention Cn		423880	4/9/1943	1833436	9/28/2014	7/1/2014	9/28/2014	89		St Joseph Medical Center	Presenting Problem : V70.9 General Medical Exam Not Otherwise Specified	8	2
Baltimore County Detention Center	Baltimore County Detention Cn		418629	10/18/1963	1970888	10/2/2014	10/1/2014	10/8/2014	2		GSAC	Presenting Problem : J43.9 Spontaneous Not Otherwise Specified	3	2
Baltimore County Detention Center	Baltimore County Detention Cn		427028	9/26/1963	1833486	9/29/2014	8/12/2014	9/29/2014	48		St Joseph	Presenting Problem : V70.9 General Medical Exam Not Otherwise Specified	7	2
Cape May Correctional Center	Cape May Correctional Center		44337	8/10/1938	1834381	8/13/2014	3/12/2014	8/16/2014	76		ANCHR Psychiatric Hospital	Presenting Problem : V11.9 Personal history of Mental Disorder Not Otherwise Specified	61	2
City of Virginia Beach Correctional Center	City of Virginia Beach Correct		14-012642	1/22/1967	1973327	10/4/2014	10/3/2014	10/8/2014	1		Serious Prisoner Anne	Presenting Problem : J69.9 Active Not Otherwise Specified	0	1
City of Virginia Beach Correctional Center	City of Virginia Beach Correct		13-00833	9/16/1962	1967236	10/2/2014	11/22/2013	10/2/2014	313		Serious Prisoner Anne	Presenting Problem : Z30.9 Shortness of Breath with Unspecified Complication	4	2
Clayton County, GA	Clayton County, GA		1330770	8/2/1972	1803289	8/1/2014	8/1/2014	8/1/2014	0		De Lumbia Care Center	S/P EDV to the head	66	2
DeKalb County Jail	Other-OC30		232890	8/16/1968	1838328	9/30/2014	9/26/2014	9/29/2014	3		MDH	Presenting Problem : Z52.0 Drug Withdrawal	7	2
DeKalb County Jail	Other-OC30		314891	1/3/1996	1962897	10/1/2014	9/30/2014	9/30/2014	10		MDH	Presenting Problem : Z52.0 Drug Withdrawal	6	2
DeKalb County Jail	Other-OC30		197248	10/6/1930	1963138	10/1/2014	9/29/2014	9/29/2014	0		MDH	Presenting Problem : Z51.9 Drug Withdrawal Not Elsewhere Classified	7	2
DeKalb County Jail	DeKalb County Jail		10162028	7/21/1979	1839642	9/30/2014	9/4/2014	9/19/2014	14		GSAC	Presenting Problem : Z52.0 Drug Withdrawal	13	2

Sample Utilization Management Report – Care Management System.

CCS has had marked success in reducing off-site medical and security costs for our clients by ensuring the provision of cost-effective, medically necessary healthcare services to our contracted populations. The Care Management system is a powerful tool for tracking, analyzing, and trending data through visual dashboards. Care Management Dashboards will allow the ADC to compare historical data as well as to analyze, trend, and compare data.

CM Details

Year Month Date Calendar February 2014

Org Region VP Name

Care Management	Org Region VP											
ADP	14,249	-	2,237	6,873	-	1,650	5,907	-	15,907	10,812	14,488	72,123
ER Visits YTD	218	0	23.5	32.5	2.5	29.5	84	6	55.5	301	181	933.5
ER Benchmark	209.17	0	21.83	43.83	5.67	34.58	89.58	4.67	62	326.5	133.75	867
ER Visits	208	0	14	23	5	39	63	7	49	311	152	871
Variance	-1.17	0	-7.83	-20.83	-0.67	4.42	-26.58	2.33	-13	-15.5	18.25	4
ERConvert Ratio YTD	24.38%	0.00%	19.26%	37.42%	40.00%	16.35%	10.79%	14.29%	38.31%	12.81%	24.46%	20.37%
ERConvert Ratio Benchmark	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%	35.00%
ERConvert Ratio	25.96%	0.00%	14.29%	39.13%	80.00%	7.69%	11.11%	28.57%	34.69%	12.22%	23.68%	19.75%
Variance	-25.82%	-100.00%	-59.18%	11.80%	128.57%	-78.02%	-68.25%	-18.37%	-0.87%	-65.09%	-32.33%	-43.58%
Admits YTD	59	0	7	16	2.5	6	9.5	1	31.5	41.5	56	230
Admits Benchmark	64.58	0	5.92	20.67	3.33	8.08	16.33	1	32	53.67	46.17	219.17
Admits	61	0	3	15	4	5	8	2	31	42	44	216
Variance	-3.58	0	-2.92	-5.67	0.67	-2.08	-8.33	1	-1	-11.67	-2.17	-3.17
Readmit 7 Day YTD	24.5	0	0	4	0	1	3.5	0.5	0.5	21.5	19.5	75
Readmit 7 Day Benchmark	28.67	0	0.33	4.58	1	2	6.25	0.67	1	33.67	15.92	91.92
Readmit 7 Day	19	0	0	5	0	1	3	1	0	23	11	63
Variance	-9.67	0	-0.33	0.42	-1	-1	-3.25	0.33	-1	-10.67	-4.92	-28.92
IP Days YTD	430	0	93.5	91.5	8.5	17.5	53	5.5	162.5	229.5	597.5	1,689.00
IP Days Benchmark	420.42	0	36.75	100.92	13.33	40.5	67.58	2.33	166	251.75	498.42	1,434.08
IP Days	394	0	72	84	12	11	42	11	159	203	533	1,521
Variance	-26.42	0	35.25	-16.92	-1.33	-29.5	-25.58	8.67	-7	-48.75	34.58	86.92
ALOS YTD	4.11	0	4.46	2.79	4	3	3.08	2.75	3.66	3.88	3.02	3.61
ALOS Benchmark	4	4	4	4	4	4	4	4	4	4	4	4
ALOS	4.22	0	5.2	3.08	3	2	1.57	5.5	3.67	3.56	2.78	3.51
Variance	0.22	-4	1.2	-0.92	-1	-2	-2.43	1.5	-0.33	-0.44	-1.22	-0.49
Outpatient YTD	477.5	0	104	192.5	7	185.5	139	0	529.5	228	430.5	2,293.50
Outpatient Benchmark	453.75	0	97.83	234.17	13.33	196.17	139.33	0	520	222.08	327.5	1,719.50
OP Visits	289	0	47	116	9	74	80	0	254	122	243	1,234
OP Visits w/Procedures	29	0	23	25	0	2	6	0	33	30	43	191
Outpatient Total Visits	461	0	102	190	9	173	135	0	539	209	424	2,242
Variance	7.25	0	4.17	-44.17	-4.33	-25.17	-4.33	0	19	-13.08	96.5	522.5
OP Surgery YTD	13.5	0	7.5	14	0	3.5	5	0	6	5	4.5	59
OP Surgery Benchmark	9.75	0	7.5	13.33	0.33	3.67	5.58	0	6	4.25	7.92	52.58
OP Surgeries	14	0	8	13	0	5	7	0	6	3	5	61
Variance	4.25	0	0.5	-0.33	-0.33	1.33	1.42	0	0	-1.25	-2.92	8.42

Standard Dashboard – Care Management System.

Pharmacy Provision

CCS has been providing pharmacy services to the ADC at Kingman, Phoenix West, Florence West and CACF since 2009 is are very familiar with the ADC requirements for providing pharmacy. Importantly, we have a national contract with the current provider so expect a seamless transition.

CCS and Diamond have partnered since 2003 to provide medication for tens of thousands of patients in prison facilities nationally. Because of our ongoing partnership with Diamond, we receive very cost-effective and competitive pricing for pharmaceutical services. Diamond will maintain all pharmaceutical licenses in accordance with state and federal regulations.

CCS Pharmacy Management Process	
Feature	Description
Direct Observed Therapy	CCS personnel are trained to provide direct observed therapy for medications subject to abuse, psychotropic medications, and those related to the treatment of communicable and infectious diseases.
Keep-on-Person (KOP) Program	CCS has established a spectrum of KOP programs intended to assist in educating residents about their medications and to promote resident responsibility for their own continuing state of health. A KOP program serves a dual role in that it typically reduces the amount of health care professional time devoted to medication distribution.
Medication Renewals	CCS maintains a system for medication renewals to ensure that required medications are continuously available for all patients who require them. CCS reviews all orders for controlled substances every two weeks.
Medication Renewals for Patients at Risk	The psychiatrist should evaluate patients prior to the renewal of psychotropic medications. The evaluation and re-order is documented in the patient's health record.
Medication Education	CCS staff are instructed to educate patients on prescribed pharmacotherapy at the time the therapy is ordered. The education is documented in the patient's health record.
Release Planning	CCS processes facilitate release planning to ensure a patient's continuity of care, especially in patients with mental illnesses. CCS works hard to provide as many resources as possible to enable released patients to continue their treatment plans, hopefully enhancing their state of health and reducing the likelihood of recidivism. Upon transfer to another facility, a medical transfer form will accompany the patient. This form provides all necessary information required for the continuation of treatment. CCS staff will continue to provide discharged medication as outlined in ADC policy and state regulations.
House Stock Supply	CCS only uses in-house stock medications as appropriate and as allowable within state guidelines.

CCS Pharmacy Management Process

Feature	Description
Safety and Security	CCS stores controlled substances, syringes, needles, and surgical instruments under secure conditions. Items subject to abuse are inventoried on a regular schedule and stored securely according to ACA and NCCHC guidelines. Regular audits are conducted to remove discontinued or expired medications. CCS will consult with the ADC on the location of the secure storage area.
Formulary Management	CCS will use the facility formulary as established by Diamond.
Administration of Non-formulary Medications	<p>Non-formulary medications may be provided for up to seven days. A physician assesses each patient's need for non-formulary medications within seven days of intake.</p> <p>Barriers to the use of individual medications vary depending upon the nature of the medication. The following two examples illustrate how CCS utilizes our formulary to deliver appropriate, cost-effective pharmacologic care.</p> <p>Example 1: Sulfasalazine (Azulfidine) and mesalamine (Asacol, others) are two medications commonly used in the treatment of inflammatory bowel disease. Mesalamine (5-aminosalicylic acid) is the active component of sulfasalazine, and both medications have extremely similar if not identical efficacies. Sulfasalazine is an older, inexpensive drug; mesalamine is a newer and thus more expensive drug. The major difference is that a small percentage of patients, perhaps as much as a third, experience gastrointestinal symptoms with sulfasalazine and require mesalamine instead. In our formulary process, we request that patients try sulfasalazine first, then if a patient develops gastrointestinal symptoms, we will dispense mesalamine. In doing so, CCS encourages cost-effective choices while promoting effective treatment for our patients.</p> <p>Example 2: NSAID therapy (ibuprofen and similar medications) is both common and effective. Because so many of these medications are available over the counter, many patients (and some practitioners) forget that long-term use of NSAIDs can lead to dangerous side effects. In our formulary process, short-term NSAID usage is permitted without special permission, but long-term NSAID usage requires approval from the treating practitioner. This allows the practitioner to weigh the benefits of long-term NSAID treatment against the risk of possible side effects before choosing a treatment plan.</p>
Formulary Implementation	

Emergency Pharmacy Services

Emergency medications not found in either the emergency medication kit or the starter packs and unavailable from Diamond in sufficient time will be provided in a minimum quantity by a local back-up pharmacy in the immediate area of the ADC facility. Due to Diamond's size and volume, they have aggressive national contracts with most chain pharmacies and are willing to negotiate with any local pharmacy of choice that is not in their network.

Medication Packaging and Dispensing

Our professional pharmacy subcontractor will provide an array of medical and pharmaceutical packaging systems including blister card packaging, designed for convenience and to meet the needs of the inmates at Kingman. Prescription medications in cream form will be dispensed in the manner supplied by the medication's manufacturer. Non-prescription medications will be dispensed in a similar manner. CCS ensures that all residents will be provided with medications that are accurately packaged and delivered in a timely manner. All prescriptions will be properly and accurately labeled in compliance with all applicable State of New Hampshire and federal laws and regulations.

Delivery

CCS will provide 24 hours per day, seven (7) days per week (24/7) medication and supplies services. Regular delivery of medications and supplies from Diamond will be available for next day delivery at a scheduled time, Monday through Saturday, excluding nationally recognized holidays. Local services will be engaged in the event of an emergency need.